

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

MONICA PROSPER

Plaintiff,

v.

THOMSON REUTERS (GRC), INC.

Defendant.

Case No. 3:15-cv-00007-CVG-RM

ACTION FOR DAMAGES,
TITLE VII DISCRIMINATION,
AGE DISCRIMINATION
SEXUAL HARASSMENT,
NEGLIGENCE AND
INTENTIONAL INFLECTION
OF EMOTIONAL DISTRESS,
FAIR LABOR STANDARDS ACT
JURY TRIAL DEMANDED

MOTION FOR POSSIBLE CONTINUANCE OF WITHDRAW HEARING

COMES NOW KANAAN L. WILHITE, counsel for Plaintiff MONICA PROSPER (hereinafter "Prosper" or "Plaintiff"), to inform the Court of his potential unavailability for the hearing on the pending Motion to Withdraw currently scheduled in this matter for August 28, 2015 at 9:00 am, for the following reasons:

1. Attorney Treston E. Moore is currently off-island on a previously scheduled vacation. Attorney Kanaan Wilhite has handled this case and is prepared to appear on behalf of Moore Dodson & Russell, PC.

2. At present, there is uncertainty as to whether Tropical Storm Erika will strike the Territory during the period August 26-28, 2015, or what the strength of this weather system will be at that time.

3. The undersigned lives aboard a sailing vessel, and will have to depart the Territory for safe shelter for approximately 72 hours should updated weather forecasts warrant. On the other hand, if weather forecasts improve, the undersigned is prepared to appear on August 28 as

MOTION FOR POSSIBLE CONTINUANCE

Prosper v. Thomson Reuters

Page 2

scheduled. We will call chambers earlier that day to provide Court staff with an update, and apologize to the Court and counsel for this circumstance.

WHEREFORE, for the foregoing reasons, the undersigned respectfully requests that the Court grant a brief continuance of the withdraw hearing in this matter, should he become unavailable due to weather conditions.

Dated: August 25, 2015

Respectfully submitted,

/s/ Kanaan L. Wilhite

Treston E. Moore, Esq.

Kanaan L. Wilhite, Esq.

Attorney for Defendant

MOORE, DODSON & RUSSELL, P.C.

5035 (14A) Norre Gade, Suite 201

St. Thomas, V.I. 00802

Telephone: (340) 777-5490

Facsimile: (340) 777-5498

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2015, a true and correct copy of the foregoing was forwarded via the District Court's ECF system to the following counsel of record who is a Filing User, pursuant to LRCi. 5.4(i):

Benjamin A. Currence, Esq.

P.O. Box 6143

St. Thomas, VI 00804

Telephone 340-775-3434

bencurrence@gmail.com

/s/ Kanaan L. Wilhite